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15 UNITED STATES DISTRICT COURT
 16 NORTHERN DISTRICT OF CALIFORNIA

18 BRENDA HILL, MEDHANIE BERNE, PATSY
 HARDY, MICHELLE MIKE, EVELYN
 19 JENNINGS and RENA HARRISON,

20 Plaintiffs,

21 vs.

22 KAISER FOUNDATION HEALTH PLAN,
 INC.; KAISER FOUNDATION HOSPITALS;
 23 and THE PERMANENTE MEDICAL GROUP;
 d/b/a KAISER PERMANENTE MEDICAL
 24 CARE PROGRAM,

25 Defendants.

No. CV 10 2833-RS

**STIPULATION AND ~~PROPOSED~~ ORDER
 RE: EXTENSION OF TIME FOR
 DEFENDANTS' RESPONSE TO FIRST
 AMENDED COMPLAINT**

26 The parties to the above-entitled action, by and through their respective counsel, hereby
 27 stipulate to entry by the Court of an Order as follows:
 28

1 WHEREAS, the current deadline for Defendants' response to Plaintiffs' First Amended
2 Complaint is April 11, 2011; and

3 WHEREAS, on April 8, 2011, Defendants decided they wish to substitute in new counsel to
4 represent them in this action, and need time to transition the matter to the new counsel;

5 THEREFORE, the deadline for Defendants to file and serve their response to Plaintiffs' First
6 Amended Complaint shall be extended to and including May 2, 2011.

7 IT IS SO STIPULATED.

8
9 Dated: April 8, 2011

JEREMY L. FRIEDMAN
KENDRA L. TANACEA
GORDON W. RENNEISEN

11
12 By: /S/ Gordon W. Renneisen

13 Attorney for Plaintiffs
14 BRENDA HILL, MEDHANIE BERHE, PATSY HARDY,
MICHELLE MIKE, EVELYN JENNINGS and RENA
HARRISON

15
16 Dated: April 8, 2011

NIXON PEABODY LLP

17
18 By: /S/ Seth L. Neulight
Seth L. Neulight

19 Attorneys for Defendants
20 KAISER FOUNDATION HEALTH PLAN, INC., KAISER
21 FOUNDATION HOSPITALS, and
22 THE PERMANENTE MEDICAL GROUP
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DECLARATION OF SETH L. NEULIGHT

I, Seth L. Neulight, hereby declare:

1. I am a partner in the law firm of Nixon Peabody LLP, counsel of record to Defendants in the above-captioned action. I make this declaration in support of the parties' joint Stipulation and [Proposed] Order re: Extension of Time for Defendants' Response to First Amended Complaint. The facts set forth below are within my personal knowledge, and if called upon to testify to these facts I could and would do so competently.

2. In response to the Court's Order granting Defendants' Motion to Dismiss, Plaintiffs filed their First Amended Complaint ("FAC") on March 38, 2011. Defendants' statutory deadline for filing their response to the FAC is April 11, 2011.

3. This morning, April 8, 2011, I was notified that Defendants wish to substitute in new counsel to represent them in this action. I am informed and believe the firm of Paul Hastings LLP will become counsel to Defendants upon the filing of a Substitution of Counsel which will occur as soon as practicable.

4. Good cause exists to extend the deadline for Defendants to file their response to the FAC from April 11 to May 2, 2011. This time period is needed to effect an orderly transition of the case from our firm to Defendants' new counsel, including the delivery of case files, the review of those files by the new counsel, and their preparation for the representation of Defendants in the matter going forward.

I declare under penalty of perjury under the laws of the State of California and the United States of America that the foregoing is true and correct. Executed this 8th day of April, 2011, in San Francisco, California.

/S/Seth L. Neulight

Seth L. Neulight

[PROPOSED] ORDER

This Court, having reviewed the parties' Stipulation, and good cause appearing, HEREBY ORDERS that the deadline for Defendants to file and serve their response to Plaintiffs' First Amended Complaint shall be extended to and including May 2, 2011.

IT IS SO ORDERED.

Dated: 4/11, 2011



HONORABLE RICHARD SEEBORG
United States District Judge